

RM-10867 Comments ---- ARRL Proposal

FCC Chairman Powell, Commissioners, and Wireless Telecommunications Bureau:

Licensing is one form of a nationally accepted certification process that validates and documents demonstrated mastery of required proficiencies via examination. Amateur radio licensing is an integral part of that process.

The recent ARRL license restructuring proposal submitted to the FCC recommends grandfathering thousands of Advanced class amateurs to Extra class; many of whom are the same radio amateurs that were previously grandfathered from General class to Advanced class. If the FCC approves the ARRL proposal as submitted, those amateurs will have been grandfathered from General class to Advanced class and then grandfathered again to Extra class without demonstrating qualification by examination at either license class. Double grandfathering is inappropriate and unacceptable.

The proposal indicates that the Advanced class and the Extra class examinations were very similar and of equal content and difficulty through the years. It is then logical and reasonable that those General class operators previously grandfathered to Advanced class be required to successfully pass the written Extra class license examination for upgrade. Thus, if the last examination successfully passed was the General Class then they must pass the Extra Class license examination or remain at Advanced.

The ARRL does not address or acknowledge in its proposal that the door is wide open for upper end double grandfathering. Maybe not by design originally, but nonetheless present between the lines.

The FCC must not inadvertently create a circumstance in amateur radio licensing that that permits a free ride through both upper classes of amateur radio license without taking any examination for either class. The FCC has a duty remove upper end double grandfathering or any semblance thereof by ensuring that it is not possible in the new ruling.

The FCC, thus, has a duty to uphold amateur radio's credibility in licensing by ensuring that all radio amateurs are equivalently qualified by examination at each license class level. Grandfathering from General class to Extra class is not equivalent.

The 5 wpm Morse code requirement at the extra class licensing examination is a most reasonable requirement for obvious reasons.

The new "Novice" (or other name) license must be a 35 question test justified by the accompanying increased privileges. Currently examinees have no difficulty passing the current 35 question Technician license examination.

It is not appropriate to grandfather the present Novice licensees to General class.

Thoughts Relating to an Appropriate Ruling --- 3 classes of Amateur Radio License

The appropriate ruling for the Amateur Radio Service would be to grandfather those Advanced class licensees that have previously passed the Advanced class examination to Extra class; justified by the previous similarity of the examination content.

Permit those current Advanced class radio amateur licensees that were previously grandfathered from General class to Advanced class to remain at Advanced class until they upgrade to Extra by examination.

This will reduce the Advanced licensee census, thus reducing the administrative load.

Likewise, grandfather all Technician plus/Technician HF class licensees to General. Require 5 wpm Morse code to General (if Element 1 was not previously passed) and 10 wpm to Extra class. Morse code requirement(s) are justified to ensure appropriate motivation, skill, intent, and practices of each operator in the Amateur Radio Service.

Grandfathering Technician to General would depend upon where the requirement for the Morse code examination is placed. If nothing else, at least 5 wpm Morse code at some point in the licensing process.

Present Novices are grandfathered to the new Novice or Communicator license, or however designated license.

This is the fairest and most appropriate plan for the future of the Amateur Radio Service. It provides the most incentive for upgrading. This will reduce the number of license classes to three, ultimately the reducing the administrative load.

Eliminate the present question pools and the NCVEC write new questions. Then ARRL, W5YI, Gordon West Radio School, and the likes can prepare legitimate study guide texts. The study guide texts will contain NO test questions. The study guide text authors must not write the study guides from the actual questions.

Band, spectrum, mode, and power output privileges must be proportional to the class of license. Incentive is generated with significant increases in band, mode, and power output privileges for each license class. Minor differences between the band, spectrum, mode, and power output privileges for each license class will not result in sufficient incentive/motivation to upgrade.

It is imperative that the Amateur Radio Service require challenging standards in the licensing and upgrade process to ensure the quality of the Amateur Radio Service in the United States. Another Citizens Band Radio-type fiasco is unacceptable.

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